

EXHIBIT AD

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

COREPHOTONICS, LTD.,
Patent Owner.

Case No. IPR2020-00897
U.S. Patent No. 10,324,277

PATENT OWNER'S RESPONSE

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U.S. Patent No. 10,324,277

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1.	The Petition Fails to Demonstrate that Claims 11-17 are Unpatentable Over the First Modification of Ogino Example 5 in view of Bareau.	40
a.	Petitioner ignores the manufacturability of the lenses.	40
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III. LEVEL OF ORDINARY SKILL

Petitioner offers that a “person having ordinary skill in the art (“POSITA”) would include someone who had, at the priority date of the ‘277 Patent, (i) a Bachelor’s degree in Physics, Optical Sciences, or equivalent training, as well as (ii) approximately three years of experience in designing multi-lens optical systems.” Pet. at 7. Further, “[s]uch a person would have had experience in analyzing, tolerancing, adjusting, and optimizing multi-lens systems for manufacturing, and would have been familiar with the specifications of lens systems and their fabrication.” *Id.* Petitioner also submits that “a POSITA would have known how to use lens design software such as Codev, Oslo, or Zemax, and would have taken a lens design course or had equivalent training.” *Id.* Patent Owner does not disagree with Petitioner’s definition of a POSITA. Ex. 2001, ¶20.

IV. CLAIM CONSTRUCTION

Petitioner notes that two terms, “Effective Focal Length (EFL)” and “Total Track Length (TTL),” have previously been construed in relation to other patents that share a common specification with the ‘277 Patent. Pet. at 8. Specifically, the Board construed these two terms in IPR2018-01140 as follows: